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*Attorneys for Plaintiff
and the putative classes*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TAYLOR STUBBINS, on behalf of herself
and all other similarly situated individuals,

Plaintiff,

vs.

SPRING VALLEY HOSPITAL
MEDICAL CENTER; VALLEY HEALTH
SYSTEMS, INC.; UNIVERSAL HEALTH
SERVICES, INC., and DOES 1 through
50, inclusive,

Defendant(s).

Case No.: 2:24-cv-01672-EJY

**DECLARATION OF TAYLOR STUBBINS
IN SUPPORT OF PLAINTIFF'S MOTION
FOR CIRCULATION OF NOTICE
PURSUANT TO 29 U.S.C. § 216(b)**

I, Taylor Stubbins, hereby state as follows:

1. I have personal knowledge of the facts and circumstances set forth in this declaration. If I were called as a witness, I would and could completely testify to the matters set forth herein.

2. I was employed by Spring Valley Hospital Medical Center ("Spring Valley") located at 5400 S. Rainbow Blvd. Las Vegas, NV 89119 from on or about June 22, 2020, to on or about January 16, 2024.

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1 3. I worked as a Registered Nurse (“RN”) in the Intermediate Care Unit (“IMC”). I
 2 was an hourly paid, non-exempt, non-union employee and was paid \$43.00 per hour at the time
 3 of my termination.

4 4. I was a full-time employee from the beginning of my employment to sometime in
 5 2022. At first, I was scheduled for and worked three 12.5-hour shifts. For the remainder of my
 6 employment, I was scheduled for and worked two 12.5-hour shifts. Throughout my employment,
 7 I worked extra shifts and worked overtime as needed.

8 5. While I worked at Spring Valley, I would clock in and out via the KRONOS
 9 timekeeping system. Hourly paid employees were required to clock in and out so we would be
 10 compensated for the hours we worked.

11 6. In addition, I believe all employees are required to clock out for our meal periods,
 12 but we were not required to clock in and out for rest breaks.

13 7. I was aware of Spring Valley’s policy of rounding to the quarter hour through the
 14 Timekeeping Acknowledgment I was provided when I was hired. For instance, if my shift started
 15 at 7:00 p.m. and I clocked in anytime between 6:53 p.m. and 7:00 p.m., it would round my time
 16 up. If I clocked in earlier at 7:52 p.m., it would round my time back to 7:45. This policy also
 17 applied to the end of my regularly scheduled shift.

18 8. Because of Spring Valley’s rounding policy, I believe I was not compensated for
 19 all the time I worked before the beginning of my regularly scheduled shift and at the end of my
 20 regularly scheduled shift. I believe that when I worked over 40 hours in a workweek the rounding
 21 policy also deprived me of overtime premium pay for the workweek.

22 9. As a Registered Nurse, I was required to use an electronic device, “The Cerner
 23 Mobile Device”, throughout the entirety of my shift. I believe all my colleagues were also
 24 required to carry the Cerner Mobile Device during the entirety of their shift, even when taking
 25 lunch or when we were supposed to be able to take a rest break. I rarely, if ever, received a rest
 26 break.

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10. When I first began working at Spring Valley, I would sign out a Cerner Mobile Device at the start of my shift. There was a sign-in/out sheet so that Spring Valley could track which employee had which device in their possession.

11. I used my unique login credentials to log in to the Cerner Mobile Device at the start of the shift, and I would log out at the end of my shift. I would sign my Cerner Mobile Device back in and then use the sign-in/out sheet to sign it back in for use by another employee. Employees were strictly prohibited from sharing login credentials.

12. Before I left Spring Valley, the process for checking in/out of the Cerner Mobile Device was changed. Employees would hand off their Cerner Mobile Device to a colleague. This hand-off took place when the outgoing nurse would provide the incoming nurse with a pass-down report of information about the patients and other work-related issues at the end of the outgoing nurse's shift and at the beginning of the oncoming nurse's regularly scheduled shift start time. If I did not have a colleague to hand off my Cerner Mobile Device to, I would log out of the device and turn it into the Charge Nurse.

13. There was no policy or procedure in place for me to hand off or turn off the Cerner Mobile Device during the entirety of my regularly scheduled shift.

14. The Cerner Mobile Device was used to communicate with co-workers, particularly physicians, nurses, and other medical staff, regarding patients under my care during my entire shift, including during meal periods and rest breaks.

15. I was always monitoring my Cerner Mobile Device for alerts, notifications, patient emergencies, and physical calls, among other things, throughout my shift.

I have read the foregoing statement consisting of this page and two (2) others and declare under the laws of the United States of America and the State of Nevada that the foregoing is true and correct.

Executed this 13th day of September 2024 in Las Vegas, Nevada.



Taylor Stubbins



Audit trail

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